FPL

March 26, 2020
L-2020-058
10 CFR 50.36

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-0001

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Wastewater Permit Number FL0001562
Request for Use and Approval
of Wood Flour for Unit 4 Condenser Tube Repairs - Notification

In accordance with Section 3.2.3 of the Turkey Point Units 3 and 4 Environmental Protection Plan (Appendix B of Renewed Facility Operating Licenses DPR-31 and DPR-41), Enclosure 1 to this letter provides a copy of the request for approval to use wood flour to temporarily repair tube leaks in the Unit 4 condenser and reduce the in-leakage of hypersaline water into the secondary system. Turkey Point will continuously use (as needed) a maximum of 900 pounds of wood flour per day at a maximum rate of 200 pounds a minute, for temporary repairs of the condenser tube leaks until permanent repairs can be completed during the October 2020 site wide outage.

On March 23, 2020 the Florida Department of Environmental Protection (FDEP) issued approval of the wood flour to temporarily repair tube leaks in the Unit 4 condenser. The FDEP determined that this activity is considered a preventive maintenance activity and does not require a permit revision. In accordance with Section 3.2.2 of the Turkey Point Units 3 and 4 Environmental Protection Plan (Appendix B of Renewed Facility Operating Licenses DPR-31 and DPR-41), Enclosure 2 provides a copy of the approval.

Should there be any questions, please contact Mr. Robert Hess, Turkey Point Licensing Manager, at 305-246-4112.

Sincerely,

Robert Hess
Licensing Manager
Turkey Point Nuclear Plant

Enclosures
cc: USNRC Regional Administrator, Region II
USNRC Senior Resident Inspector, Turkey Point Plant

ENCLOSURE 1 TO

L-2020-058

Enclosure 1 to L-2020-058
FPL Request to Use of Wood Flour for Unit 4 Condenser Tubes [e:mail dated 3/20/2020]

From: Pandya, Meghna <Meghna.Pandya@fpl.com>
Sent: Friday, March 20, 2020 3:26 PM
To: Wall, Frank (Frank.Wall@FloridaDEP.gov) <Frank.Wall@FloridaDEP.gov>; Harris, Marc (Marc.Harris@dep.state.fl.us) <Marc.Harris@dep.state.fl.us>

Subject: FPL Turkey Point Unit 4 - Wood Flour approval request

Marc/Frank,

As discussed on our call yesterday below please see the purpose, dosage and other requirements related to the referenced chemical approval:

Purpose – To plug the leak inside the Unit 4 condenser
Dosage – Approximately 900 lbs./day of wood flour based on the leak
Frequency – continuously, as needed

This will be a temporary mode to the fix the tube leak, and permanent repairs will be conducted during the October 2020 site wide outage. Please note that FPL Turkey Point has been previously approved to use the product in 2009 due to the similar issues to Unit 3 & 4 condensers, and has requested to add the product to the IWW approved chemical list via the 2017 revised permit applicaton. Please see the attached product SDS for your review and approval. Let us know if you need anything else or have any questions regarding the request.

Thanks,

Meghna Pandya
Environmental Specialist
Florida Power & Light Company | Environmental Services
700 Universe Blvd (JES/JB)
Juno Beach, FL 33408
Office: 561-691-3074
Meghna.Pandya@fpl.com

P.J. MURPHY FOREST PRODUCTS CORP.

P.O. BOX 300, 150 River Road
Montville, N.J. 07045
973-316-0800 · 800-631-1936
FAX: 973-316-9455
Website: www.pjmurphy.net

SAFETY DATA SHEET

SECTION 1: IDENTIFICATION

PRODUCT NAME:	Wood Fibers (All Species – All Grades – All Sizes)
DESCRIPTION:	Particles generated by any manual or mechanical cutting or abrasion process performed on wood.
MANUFACTURER'S NAME:	P. J. Murphy Forest Products Corp.
MANUFACTURER'S MAIN ADDRESS:	150 River Road, Suite L-1 (PO Box 300) Montville, NJ 07045
MANUFACTURER'S MAIN PHONE #:	(800) 631-1936 or (973) 316-0800
EMERGENY PHONE#:	Medical/Fire Emergency (USA) – Dial 911 Poison Emergency (USA) – Dial (800) 222-1222

SECTION 2: HAZARD IDENTIFICATION

EMERGENCY OVERVIEW: Danger!

Product Description: Light to dark colored granular solid. Color and odors are dependent on the wood species and the time since dust was generated.

Health Hazards: Can cause eye and skin irritation upon contact. Various species of wood dust can cause allergic contact dermatitis in sensitized individuals. Inhalation of dust can cause respiratory tract irritation. May cause cancer (Inhalation). May cause damage to organs (respiratory system) through prolonged and repeated exposure (Inhalation).

Flammability Hazards: Wood flour is combustible and explosive when airborne. Wood flour or wood dust is an explosion hazard if a "cloud" contains an ignition source.

Reactivity Hazards: This product is not reactive.

Environmental Hazards: Release of the product is not expected to cause long term adverse effects to the aquatic environment.

Emergency Recommendations: Emergency responders must have personal protective equipment and fire protection appropriate for the situation to which they are responding.

Classification	Hazard Statement(s)	Pictogram(s)
HEALTH Carcinogen-Category 1A (H350)*	Wood dust may cause nasopharyngeal cancer and/or cancer of the nasal cavities and paranasal sinuses by inhalation	

Skin Irritation Category 2 (H315) Specific Target Organ Toxicity- Single Exposure (STOT) Category-3 (H335)	May cause skin irritation May cause respiratory irritation	
Eye Irritation Category 2B (H320)	Causes eye irritation	None
Combustible Dust (OSHA Defined Hazard)	If converted to small particles during further processing, handling, or by other means, may form combustible dust concentrations in air	None

*Hazard codes (GHS)

Other Hazards
This product is not considered hazardous under OSHA 29 CFR 1910.1200 Hazard Communication Standard
Exposure may aggravate pre-existing eye, skin, or respiratory conditions.
HMIS Rating (Scale 0-4): Health =1* Fire =1 Physical Hazard =0 PPE=E
NFPA Rating (Scale 0-4): Health =1 Fire =1 Reactivity =0 Special Information=None
*chronic health hazard
E=Safety Glasses and Gloves

Precautionary Statement(s):
Prevention Statements:
-Obtain special instructions before use
-Do not handle until all safety precautions have been read and understood
-Wash hands, forearms, and any other exposed areas thoroughly after handling
-Do not eat, drink, or smoke when using this product
-Use only in a well ventilated area
P210: Keep away from sparks, flame or other heat sources.
P243: Take precautionary measures against static discharge.
P260 and P261: Avoid breathing dust.
P280: Wear appropriate protective equipment for skin exposure. In case of inadequate ventilation wear an approved respirator suitable for conditions of use.
P362 and P363: Take off contaminated clothing and wash before reuse.
Response Statements:
-If exposed or concerned: Get medical advice/attention
-Get medical advice/attention if you feel unwell
P304 and P340: If inhaled and breathing becomes difficult, remove person to fresh air and keep comfortable for breathing.
P308 and P313: If experiencing respiratory symptoms, following removal to fresh air, call a doctor or other qualified medical professional.
P313: If skin irritation or rash occurs get medical advice/attention.
P362: Wash contaminated clothing before reuse.
P352 and P264: If on skin wash with plenty of soap and water.
P338 and P351: If in eyes, rinse cautiously for several minutes. Remove contact lenses if present and easy to do so.
Disposal:
P501: Dispose of in accordance with federal, state and local regulations.
Ingredients of Unknown Acute Toxicity (>1%): Not Available

SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS

Components: 100% Natural Wood Fibers
CAS #: N/A
Impurities and/or Stabilizing Additives: None

SECTION 4: FIRST-AID MEASURES

Eye Contact: Treat dust in eye as a foreign object. Flush with water to remove dust particles for 15 minutes. Remove contact lenses if present and easy to do so. Avoid touching or rubbing eyes to avoid further irritation or injury. If irritation develops or persists, get medical attention.

Skin Contact: In case of contact, wash thoroughly with soap and large amounts of water. Remove contaminated clothing. Drench affected area with water for at least 15 minutes. Wood dust can elicit contact dermatitis. If a rash or persistent irritation or dermatitis occurs, get medical advice where applicable before returning to area where wood dust is present.

Inhalation: Using proper respiratory protection, move the exposed person to fresh air if respiratory symptoms are experienced. Encourage exposed person to cough, spit out, and blow nose to remove dust. Seek medical help if persistent irritation, severe coughing, breathing difficulty, or other serious symptoms occur.

Ingestion: Not applicable. Seek medical attention if large amount is swallowed.

Symptoms or Effects:

Acute Symptoms/Effects – Wood dust may cause mechanical irritation of the respiratory system. Wood dust can cause physical obstructions in the nasal passages, resulting in dryness of nose, dry cough, and sneezing. Prolonged contact with large amounts of dust may cause mechanical irritation of the eyes.
Delayed Symptoms/Effects – Unique delayed effects are not anticipated after exposure. See Section 11 for additional information on chronic effects.

SECTION 5: FIRE-FIGHTING MEASURES

Flash Point:	Not applicable
Auto-ignition Temperature:	Variable with exposure to temperatures as low as 212° F (typically 400-500°F)(204-260 °C)
Flammability Limits in Air:	40 grams per cubic meter (LEL)
Suitable Extinguishing Media:	Water, Sand, CO_2
Special Fire Fighting Procedures:	Use water to wet down wood dust to reduce the likelihood of ignition or dispersion of dust into the air. Remove burned or wet dust to open area after fire is extinguished. Beware of potential combustible dust explosion hazard.
Unusual Fire and Explosion Hazard:	Wood dust is an explosive hazard and the dust "cloud" may explode in the presence of an ignition source, depending on moisture content and more importantly particle diameter and airborne concentration. In the form of dust, this material is sensitive to static discharge and may form explosive mixtures in air. An airborne concentration of 40 grams of dust per cubic meter of air is often used as the LEL for wood dusts. Wood dust may similarly deflagrate (combustion without detonation like an explosion) if ignited in an open or loosely contained area. Reference NFPA Standards 654 and 664 and the NFPA Fire Protection Handbook for guidance. Ventilation systems should be kept clean and precautions should be taken to prevent sparks or other ignition sources.

SECTION 6: ACCIDENTAL RELEASE MEASURES

SPILL/LEAK RESPONSE:

Sweep or vacuum spills for recovery or disposal; avoiding creating dusty conditions. Provide good ventilation and remove any potential ignition sources where dust conditions may occur. Maintain good housekeeping to avoid accumulation of wood dust on exposed surfaces. Use approved filtering face piece respirator ("dust mask") and googles where ventilation is not possible and exposure limits may be exceeded or for additional worker comfort. Follow personal protective equipment recommendations found in Section 8 of this SDS. Place recovered wood dust in a container for proper disposal. Keep unnecessary people out of clean-up area.

Dispose of in accordance with appropriate U.S. Federal, State, and local Hazardous Waste Disposal Regulations; also regulations of Canada, Australia, EU Member States, and Japan if applicable. (See Section 13, Disposal Considerations)

SECTION 7: HANDLING AND STORAGE

PRECAUTIONS FOR SAFE HANDLING AND STORAGE:

-Avoid open flame.
-Avoid eating, drinking, smoking, or applying cosmetics while handling this product.
-Use in a well-ventilated location
-Store in a dry, cool, clean and ventilated area to avoid heat and humidity.
-Wood flour is extremely combustible and explosive when airborne. Wood flour or wood dust has a strong to severe explosion hazard if a dust "cloud" contains an ignition source. Refer to NFPA 664 and NFPA 68 for additional safe handling requirements.
-More Precautions to be taken in Handling and Storage: Dried wood dust may pose a combustible dust hazard. Keep away from ignition sources. Avoid eye contact. Avoid prolonged or repeated contact with skin. Wash hands, face, and clothing thoroughly after exposure. Avoid prolonged or repeated breathing of wood dust. Store in well-ventilated, cool, dry place away from open flame.

SECTION 8: EXPOSURE CONTROLS / PERSONAL PROTECTION

Name/CAS#/%: Wood Flour/None/100%

OSHA Current Exposure Limits

OSHA PEL-TWA 15 mg/m3 (total dust)
OSHA PEL-TWA 5 mg/m3 (respirable dust)
ACGIH TLV-TWA 1 mg/m3 (respirable dust)
ACGIH TLV-STEL 10 mg/m3 (softwood total dust)
ACGIH TLV-TWA 1 mg/m3 (selected hardwood total dust (beech, oak, other))

Recommended Exposure Limits(1)

PEL-TWA 5 mg/m3 (softwood or hardwood total dust)
PEL-STEL 10 mg/m3 (softwood or hardwood total dust)
PEL-TWA 2.5 mg/m3 (Western red cedar total dust)

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(1) See important footnote below concerning OSHA PELs for wood dust

Information on ***Cellulose***

Chemical Name:	Cellulose
CAS#:	9004-34-6
ACGIH TLV	5.0mg/Cubic Meter
OSHA PEL TWA	10mg/Cubic Meter (Total Dust, Hardwoods)(1)
ACGIH TVL -TWA:	1.0 mg/m^3 (certain hardwoods) 5.0 mg/m^3 (respirable fraction)

Hazardous Ingredients:	Cellulose
WT %:	100%
CAS #:	9004-34-6
EINECS #:	232-674-9
RTECS #.:	FJ5691460

Hazard Classification: (Xn) Harmful
Risk Phrases: R2, R36/37/38, R45
CHEMICAL FORMULA: $C_6H_{10}O_5$

Balance of other ingredients is less than 1% in concentration (or .1% for carcinogens, reproductive toxins, or respiratory sensitizers).

GENERALLY APPLICABLE CONTROL MEASURES AND PROTECTIVE EQUIPTMENT:

-Keep formation of dust to a minimum
-Wear goggles or safety glasses. Other protective equipment such as gloves and approved dust respirators may be needed depending upon dust conditions.

LOCAL EXHAUST – Provide local exhaust as needed so that exposure limits are met. Provide adequate general and local exhaust ventilation to maintain healthful working conditions. Ventilation to control dust should be considered where potential explosive concentrations and ignition sources are present. The design and operation of any exhaust system should consider the possibility of explosive concentrations of wood dust within the system. See "SPECIAL" section below.
MECHANICAL (GENERAL) –Provide general ventilation in processing and storage areas to maintain dust levels under exposure limits.
SPECIAL – Ensure that exhaust ventilation and material transport systems involved in handling this product contain explosion relief vents or suppression systems designed and operated in accordance with applicable standards if the operating conditions justify their use.
OTHER ENGINEERING CONTROLS –Cutting and machining of product should preferably be done outdoors or with adequate ventilation and containment. Emergency eye wash fountains and safety showers should be available in the immediate vicinity of any potential exposure. Ensure all national/local regulations are observed. Proper grounding procedures to avoid static electricity should be followed.

The following information on appropriate Personal Protective Equipment is provided to assist employers in complying with OSHA regulations found in 29 CFR Subpart 1(beginning at 1910.132) or equivalent standard of Canada, or standards of EU Member States (including EN 149 for respiratory PPE, and EN 166 for face/eye protection), and those of Japan. Please reference applicable regulations and standards for relevant details.

RESPIRATORY PROTECTION: Maintain airborne contaminant concentrations below guidelines listed above, if applicable. If necessary, use only respiratory protection authorized in the U.S. Federal OSHA Respiratory Protection Standard (29 CFR 1910.134), equivalent U.S. State Standards, Canadian CSA Standard Z94.4-93, the European Standard EN 149, or EU Member States.
EYE PROTECTION: When engaged in activities where ingredients could contact the eye, wear safety glasses or goggles. In extremely dusty environments and unpredictable environments, wear unvented or indirectly vented goggles to avoid eye irritation or injury. Contact lenses should not be worn when working in extremely dusty environments. If necessary, refer to U.S. OSHA 29 CFR 1910.133, Canadian Standards, and the European Standard EN 166, Australian Standards, or relevant Japanese Standards.
HAND PROTECTION: Use gloves when handling this product to reduce skin contact as appropriate. If necessary, refer to U.S. OSHA 29 CFR 1910.138, the European Standard DIN EN 374, the appropriate Standards of Canada, Australian Standards, or relevant Japanese Standards.
BODY PROTECTION: Use body protection appropriate for the task (e.g. lab coat, overalls). If necessary, refer to appropriate Standards of Canada, or appropriate Standards of the EU, Australian Standards, or relevant Japanese Standards. If a hazard of injury to the feet exists due to falling objects, rolling objects, where objects may pierce
the soles of the feet or where employee's feet may be exposed to electrical hazards, use foot protection, as described in U.S. OSHA 29 CFR 1910.136.

(1) In AFL-CIO v OSHA 965 F. 2d 962 (11th Cir.1992), the court overturned OSHA's 1989 Air Contaminants Rule, including the specific PEL's for wood dust that OSHA had established at the time. The 1989 vacated PEL's were: 5 mg/m3 PEL-TWA and 10 mg/m3 STEL (15 min), all softwood and hardwood except Western Red Cedar. Wood dust is now regulated by OSHA as "Particulates Not Otherwise Regulated" (PNOR), which is also referred to as "nuisance dust". However, some states have regulated wood dust PEL's in their state plans. Additionally, OSHA indicated that it may cite employers under the OSH Act general duty clause in appropriate circumstances.

SECTION 9: PHYSICAL AND CHEMICAL PROTERTIES

Appearance and Odor:	Light to dark colored granular solid. Color and odor are dependent on the wood species and length of time since dust was generated.
Odor Threshold:	Not applicable
pH:	Not applicable
Melting Point/ Freezing Point:	Not applicable
Initial Boiling Point(@760MM Hg)	329 Degrees Fahrenheit (165 Degrees Centigrade)
Flash Point:	Not applicable
Evaporation Rate (Butyl Acetate=1):	Not applicable
Flammability:	Combustible Solid
Explosive Limits:	40 g / m^3 - LEL
Vapor Pressure:	Not applicable
Vapor Density:	Not applicable
Relative Density:	Not applicable
Solubility in H_2O (% by Weight):	Insoluble
Partition Coefficient (n-octanol/water):	No Data Available
Auto-Ignition Temperature:	As low as 212 Degrees Fahrenheit
Decomposition Temperature:	500-518 Degrees Fahrenheit
Viscosity:	Not applicable

SECTION 10: STABILITY AND REACTIVITY

Reactivity:	None reported for Wood Flour/Wood Dust. (Cellulose can be reactive to Water Bromine Pentafluoride Sodium Nitrate Fluorine Strong Oxidizers)
Chemical Stability:	Stable under normal conditions
Possibility of Hazardous Reactions:	Will not occur
Conditions to Avoid:	Incompatible Material, Sparks, Heat, Open Flame, Ignition Sources
Incompatible Materials:	Avoid contact with oxidizing agents and drying oils. Avoid open flame. Product may ignite at temperatures in excess of 212° F.
Hazardous Decomposition or By-Products:	Thermal decomposition (i.e. smoldering, burning) can release carbon monoxide, oxides of nitrogen, carbon dioxide, terpenes and polycyclic aromatic hydrocarbons. Natural decomposition of organic materials such as wood may produce toxic gases and an oxygen deficient atmosphere in enclosed or poorly ventilated areas. Spontaneous and rapid hazardous decomposition will not occur.
Sensitivity to Static Discharge:	Airborne wood dust may be ignited by a static discharge depending on airborne concentrations, particle size and moisture content.

SECTION 11: TOXILOGICAL INFORMAITON

No formal data exists for Wood Flour or Wood Dust. Detailed information for the ingredient *Cellulose* can be found at the following website; http://www.cdc.gov/niosh-rtecs/FJ56D844.html Source: NIOSH (National Institute for Occupational Safety and Health). **NIOSH information for *Cellulose* Standards and Regulation, Documentation and Surveillance, Status in Federal Agencies, and References is listed below.**

HEALTH EFFECTS OR RISKS FROM EXPOSURE:

ACUTE:

-INHALATION: High concentrations are irritating to the respiratory tract; may cause headache, dizziness, nausea, vomiting and malaise.
-SKIN: Contact may cause irritation. Various species of wood dust can cause allergic contact dermatitis in sensitized individuals.
-EYES: Contact may cause irritation and discomfort.
-INGESTION: Not a normal route of entry for this material.
NOTE: Wood Dust may aggravate pre-existing respiratory conditions or allergies.

CHRONIC:

Wood dust, depending on species, may cause dermatitis on prolonged, repetitive contact; may cause respiratory sensitization and/or irritation. IARC classifies wood dust as a carcinogen to humans (Group 1). This classification is based primarily on IARC's evaluation of increased risk in the occurrence of adenocarcinomas of the nasal cavities and para nasal sinuses associated with exposure to wood dust. IARC did not find sufficient evidence to associate cancers of the oropharynx, hypopharynx, lung, lymphatic and hematopoietic systems, stomach, colon or rectum with exposure to wood dust.

Wood Dust -NTP: According to its Report on Carcinogens, Thirteenth Edition, NTP states, "Wood dust is known to be a human carcinogen based on sufficient evidence of carcinogenicity from studies in humans". An association between wood dust exposure and cancer of the nasal cavity has been observed in many case reports, cohort studies, and case-control studies that specifically addressed nasal cancer. Associations with cancer of the nasal cavities and paranasal sinuses were observed both in studies of people whose occupations are associated with wood dust exposure and in studies that directly estimated wood dust exposure. This classification is based primarily on increased risk in the occurrence of adenocarcinomas of the nasal cavities and paranasal sinuses associated with exposure to wood dust. The evaluation did not find sufficient evidence to associate cancers of the oropharynx, hypopharynx, lung, lymphatic and hematopoietic systems, stomach, colon or rectum with exposure to wood dust. There is inadequate evidence for the carcinogenicity of wood dust from studies in experimental animals according to NTP.
Wood Dust: IARC – Group 1: Carcinogenic to humans; sufficient evidence of carcinogenicity. This classification is primarily based on studies showing an association between occupational exposure to wood dust and adenocarcinoma to the nasal cavities and paranasal sinuses. IARC did not find sufficient evidence of an association between occupational exposure to wood dust and cancers of the oropharynx, hypopharynx, lung, lymphatic and hematopoietic systems, stomach, colon or rectum.
Toxicity Data: No specific information available for product or material in purchased form. Individual component information is listed below.
Components:
Wood dust (softwood or hardwood)
Dusts generated from sawing, sanding or machining the product may cause respiratory irritation, nasal dryness and irritation, coughing and sinusitis. NTP and IARC (Group 1) classify wood dust as a human carcinogen. See Section 2 above.
Target Organs: Eyes, skin, and respiratory system.
Note: Evaluations have occurred for the studies referenced in the ACGIH® TLV® Documentation for Wood Dust and others which included potential allergenic references for wood species which may cause skin or respiratory sensitization. There are a limited number of studies of highly variable consistency which reference sensitization from some species of wood. When the total weight of evidence is considered this product is considered to be an eye, skin and repository irritant and not a respiratory or skin sensitizer according to health hazard classification criteria.

SECTION 12: ECOLOGICAL INFORMATION

-All work practices must be aimed at eliminating environmental contamination.
-Product is composed of natural and biodegradable components. Product is not expected to bioaccumulate.

SECTION 13: DISPOSAL INFORMATION

Preparing Wastes for Disposal:	Waste Disposal must be in accordance with appropriate U.S. Federal, State, and local regulations; also those of Canada, Australia, EU Member States, and Japan if applicable. It is, however, the user's responsibility to determine at the time of disposal whether your waste meets any jurisdictional criteria. Note that wood dust may pose a combustible dust hazard. Avoid unnecessary release to the environment.

SECTION 14: TRANSPORT INFORMATION

U.S. DEPARTMENT OF TRANSPORTATION (DOT) SHIPPING REGULATIONS:
This product is classified (per 49 CFR 172.101) by the U.S. Department of Transportation as follows…

UN Identification Number:	Not Applicable
UN Proper Shipping Name:	Non-Regulated Material
Transport Hazard Class:	Not Applicable
Packing Group:	Not Applicable
DOT Label(s) Required:	None Required
Marine Pollutant:	The components of this product are not designated by the Department of Transportation to be Marine Pollutants (49 CFR 172.101, Appendix B).
Recommendations:	Dry fine materials best transported by bulk tanker or sealed bags.

INTERNATIONAL AIR TRANSPORT ASSOCIATION SHIPPING INFORMATION *(IATA)*:
This product is not considered as dangerous goods.

INTERNATIONAL MARITIME ORGANIZATION SHIPPING INFORMATION *(IMO)*:
This product is not considered as dangerous goods.

EUROPEAN AGREEMENT CONCERNING THE INTERNATIONAL CARRIAGE OF DANGEROUS GOODS BY ROAD *(ADR)*:
This product is not considered by the United Nations Economic Commission for Europe to be dangerous goods.

SECTION 15: REGULATORY INFORMATION

UNITED STATES REGULATIONS
TSCA: NAP
CERCLA: NAP
DSL: NAP
OSHA: Wood products are not hazardous under the criteria of the federal OSHA Hazard Communication Standard 29 CFR 1910.1200. However, wood dust generated by sawing, sanding or machining activities may be considered hazardous.

STATE RIGHT-TO-KNOW:
California Proposition 65 – WARNING: This product may be shipped in dust form or subsequent drilling, sawing, sanding or machining solid wood may generate wood dust, a substance known to the State of California to cause cancer. WARNING: Depending on the origin and handling of the material, crystalline silica particles of respirable size may be contained in or on the product and released during transport or processing. Silica, crystalline (airborne particles of respirable size) are known to the State of California to cause cancer.
Pennsylvania – Wood dust and crystalline silica appear on Pennsylvania's Appendix A, Hazardous Substance List. On PA RTK (Right to Know) List
New Jersey – Wood dust and crystalline silica appear on New Jersey's Environmental Hazardous Substance List. On New Jersey's Right To Know Hazardous Substance List.
SARA 313 Information: This material does not contain any chemical ingredient (s) that exceed the de minimis reporting levels established by SARA Title III, section 313 and 40 CFR section 372.
SARA 311/312 Hazard Category: This material has been reviewed according to the EPA "Hazard Categories" promulgated under SARA Title III Sections 311 and 312 and is considered, under applicable definitions, to meet the following categories:

An immediate (acute) health hazard	**Yes**
A delayed (chronic) health hazard	**Yes**
A corrosive hazard	**No**
A fire hazard	**No**
A reactivity hazard	**No**
A sudden release hazard	**No**

U.S. SARA REPORTING REQUIREMENTS: The components of this product are not subject to the reporting requirements of Sections 302, 304, and 313 of Title III of the Superfund Amendments and Reauthorization Act.
U.S. SARA THRESHOLD PLANNING QUANTITY: There are no specific Threshold Planning Quantities for the components of this product. The default Federal MSDS submission and inventory requirement filing threshold of 10,000 pounds (4,540 kg) therefore applies, per 40 CFR 370.20.
U.S. CERCLA REPORTABLE QUANTITY (RQ): None
U.S. TSCA INVENTORY STATUS: The components of this product are listed on the TSCA Inventory or are exempted from listing.
OTHER U.S. FEDERAL REGULATIONS: None
CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT*(PROPOSITION 65)*: In December 2009, "Wood Dust" was added to California's Proposition 65 list of substances "known to the state of California to cause cancer."
WARNING: This product contains chemicals known to the State of California to cause cancer.

CANADIAN REGULATIONS
CANADIAN DSL / NDSL INVENTORY STATUS: The components of this product are on the DSL Inventory, or are exempted from listing.
CANADIAN ENVIRONMENTAL PROTECTION ACT *(CEPA)* PRIORITIES SUBSTANCES LISTS: Wood Dust, Wood Flour, or Cellulose are not listed.
CANADIAN WHMIS CLASSIFICATION AND SYMBOLS: This is considered to be a hazardous material under the Hazardous Products Act as defined by the Controlled Products Regulations and is therefore subject to the labeling and MSDS requirements of the Workplace Hazardous Materials Information System (WHMIS). Labeling is not required. WHMIS Class D Division 2 Subdivision A – Very Toxic material causing other toxic effects. WHMIS Class D Division 2 Subdivision B – Toxic material causing other toxic effects.

OTHER CANADIAN REGULATIONS: Not Applicable

EUROPEAN ECONOMIC COMMUNITY INFORMATION

EU LABELING AND CLASSIFICATION: This product meets the definition of the following hazard class as defined by the European Economic Community Guidelines.

EU CLASSIFICATION:	[Xn] Harmful
EU RISK PHRASES:	R2: Risk of explosion by shock, fire or other sources of ignition.
	R36/37/38: Irritating to eyes, respiratory system and skin.
	R45: May cause cancer.
EU SAFETY PHRASES:	S16: Keep away from sources of ignition.
	S22: Do not breath dust.
	S24/25: Avoid contact with skin and eyes.
	S51: Use only in a well ventilated area.

AUSTRALIAN INFORMATION FOR PRODUCT

The components of this product are listed on the International Chemical Inventory List.

JAPANESE INFORMATION FOR PRODUCT

JAPANESE MINISTER OF INTERNATIONAL TRADE AND INDUSTRY *(MITI)* STATUS: The components of this product are not listed as Class I Specified Chemical Substances, Class II Specified Chemical Substances, or Designated Chemical Substances by the Japanese MITI.

JAPANESE ENCS INVENTORY: The components of this product are on the ENCS Inventory as indicated in the section on International Chemical Inventories, below.

POISONOUS AND DELETERIOUS SUBSTANCES CONTROL LAW: No component of this product is a listed Specified Poisonous Substance under the Poisonous and Deleterious Substances Control Law.

INTERNATIONAL CHEMICAL INVENTORIES

Listing of the components on individual country Chemical Inventories is as follows:

ASIA-PAC: Listed
AUSTRALIAN INVENTORY OF CHEMICAL SUBSTANCES (AICS): Listed
KOREAN EXISTING CHEMICALS LIST (ECL): Listed
JAPANESE EXISTING NATIONAL INVENORY OF CHAMICAL SUBSTANCES (ENCS): Listed
PHILIPPINES INVENTORY OF CHEMICALS AND CHEMICAL SUBSTANCES (PICCS): Listed
SWISS GIFTLISTE LIST OF TOXIC SUBSTANCES: Listed
U.S. TSCA: Listed

SECTION 16: OTHER INFORMATION

Safety Data Sheet Version Number: Version 1.2 August 1, 2018

IMPORTANT: The information that is presented in this SDS is believed to be accurate, but is not warranted to be so. It has been compiled from sources believed to be reliable. It is offered for your consideration, investigation and verification. Users are advised to confirm in advance of the need that information is current, applicable, and suited to the circumstances of use. P.J. Murphy Forest Products Corp. makes no warranty of any kind, express or implied, concerning the accuracy or completeness of the information and data herein. P.J. Murphy Forest Products Corp. will not be liable for claims relating to any party's use of or reliance on information and data contained herein regardless of whether it is claimed that the information and data are inaccurate, incomplete, or otherwise misleading. P.J. Murphy Forest Products Corp. assumes no responsibility for injury to vendee or third party person caused by the material if reasonable safety procedures are not adhered to as stipulated in this Safety Data Sheet. Furthermore, P. J. Murphy Forest Products Corp. assumes no responsibility for injury caused by abnormal use of this material even if reasonable safety procedures are followed.

ENCLOSURE 2 TO

L-2020-058